

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION

CRAIG SHIPP

PLAINTIFF

VS.

NO. 4:18-CV-0417 SOH

CORRECT CARE SOLUTIONS, LLC,  
DR. LORENE LOMAX, DR MIMO LEMDJA,  
KIMBERLY HOFMANN, LENORA PHILSON,  
KINDALL SMITH, DIANE CUNNINGHAM,  
MELISSA STONER, STEVE ARNOLD

DEFENDANTS

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ORAL DEPOSITION

OF

CRAIG SHIPP

TAKEN NOVEMBER 14, 2018, AT 10:06 A.M.

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**COPY**

1 to the warden.

2 Q Did you speak to your family at all during this time  
3 period?

4 A You could only -- well, through February you could not  
5 make phone calls.

6 Q So while you were on 4 South --

7 A Yeah, I wrote --

8 Q -- no phone calls?

9 A I wrote. That was the only way to contact them.

10 Q Okay. When did you first write them?

11 A As soon as we got out of the intake quarantine.

12 Q Okay. Do you remember telling someone that you had  
13 written your family on February 7th to ask them to send your  
14 shoes?

15 A No. I don't remember if I told anybody.

16 Q All right. What were you asking from your family when you  
17 wrote them letters?

18 A Asking them to, you know, call and see about getting those  
19 sent, you know, to me.

20 Q Okay. Did they write you back?

21 A Yes, they wrote me back.

22 Q Okay. What did they -- what did your family say?

23 A They said they were trying to, but the -- you know, the  
24 warden hadn't approved them, basically. My sister even called  
25 them.

1 -- well, she was already seeing the bloody foot, you know, had  
2 seen what had happened to that. And the right foot was the  
3 one, you know, that was even in worse shape I thought, you  
4 know. I already knew it was in worse shape.

5 And basically she was like, "I'm not supposed to, you  
6 know, even see you here today." That's why she -- she repeated  
7 that, that's why Nurse Kindall got me the elevator pass.

8 Q Okay. Did she say anything about contacting your family,  
9 Dr. Lemdja?

10 A Not that I remember.

11 Q Okay. If Ms. Kindall made a note that the doctor made a  
12 reference to contacting your family, would you have any reason  
13 to dispute that?

14 A I don't know what they have on my records.

15 Q Okay. Well, did numerous people in Medical mention  
16 contacting the warden or contacting your family?

17 A It was the warden mostly.

18 Q The warden?

19 A Yeah.

20 Q Okay. Now, let's move on to Dr. Lomax. What is it -- I'm  
21 trying to think of your testimony -- so what is it that you  
22 think Dr. Lomax did wrong?

23 MR. FRANSEEN: Object to form.

24 A Basically she could have helped me get the shoes, you  
25 know. That's --

1 Q Okay. Would you also agree that this is the form that you  
2 submitted?

3 A Yeah.

4 Q Okay. What's the date on that form?

5 A The 2nd and 3rd.

6 Q Okay. February 3rd; correct?

7 A Yes.

8 Q All right. Now, in that request you are seeking treatment  
9 for what?

10 A Description of the problem was deformed feet due to  
11 charcot joint and also diabetes.

12 Q All right. Now, after you submitted that request, were  
13 you seen by Medical?

14 A Yeah. I would have been seen by them.

15 Q And would it be about February 5th --

16 A Yeah.

17 Q -- would you agree? Now, who did you see during that sick  
18 call, do you remember?

19 A I do not remember.

20 Q That's perfectly okay. Do you recall during that sick  
21 call visit being told to notify your family about your shoes?

22 A No.

23 Q Do you recall seeing the doctor again on February 12th?

24 A No. I don't remember the exact dates.

25 Q You don't remember the exact date? I want to record it,